

**INTEGRATED DISPOSAL FACILITY  
ADDENDUM J.1  
PRE-ACTIVE LIFE CONTINGENCY PLAN  
CHANGE CONTROL LOG**

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
11/23/2020	PCN-IDF-2020-05 (8C.2020.Q4)
06/11/2020	PCN-IDF-2020-03 (8C.2020.Q2)
08/21/2018	PCN-IDF-2018-01 (8C.2018.Q3)
5/23/2016	8C.2016.Q1

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**ADDENDUM J.1**  
**PRE-ACTIVE LIFE CONTINGENCY PLAN**

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**ADDENDUM J.1**  
**PRE-ACTIVE LIFE CONTINGENCY PLAN**

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## J.0 CONTINGENCY PLAN

The requirements in this Addendum apply during the “Pre-Active Life” of Integrated Disposal Facility (IDF). Pre-Active Life is not defined in the regulations, but refers to the facility maintenance period between final construction and the start of active life. The IDF will transition from “Pre-Active Life” to “Active Life” prior to receipt and disposal of dangerous waste as defined in Washington Administrative Code (WAC) 173-303-040. Once the IDF begins to receive dangerous waste, the requirements in Addendum J.1 are no longer applicable, and requirements in Addendum J.2 will be applicable.

The requirements for a contingency plan at IDF are satisfied in the following documents: portions of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit (Permit) Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and this Addendum.

The unit-specific *Building Emergency Plan* (HNF-39903) also serves to satisfy a broad range of other requirements (e.g., Occupational Safety and Health Administration standards [29 Code of Federal Regulations (CFR) 1910], *Toxic Substance Control Act of 1976* [40 CFR 761] and U.S. Department of Energy [DOE] Orders). Therefore, revisions made to portions of this unit-specific Building Emergency Plan that are not governed by the requirements of WAC 173-303 will not be considered as a modification subject to WAC 173-303-830 or Permit Condition I.C.3.

Table J-1 identifies the sections of the unit-specific Building Emergency Plan written to meet WAC 173-303-350(3) contingency plan requirements. Section 12.0 of the unit-specific Building Emergency Plan is written to meet WAC 173-303 requirements identifying where copies of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and the Building Emergency Plan are located and maintained on the Hanford Facility. Therefore, revisions to Addendum J require a Permit modification subject to WAC 173-303-830 and/or Permit Condition I.C.3.

**Table J-1 Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173-303-350(3)**

Requirement	Permit Attachment 4, <i>Hanford Emergency Management Plan</i> (DOE/RL-94-02)	<i>Building Emergency Plan</i> <sup>1</sup> (HNF-39903)	IDF Addendum J.1, <i>Pre-Active Life Contingency Plan</i>
-350(3)(a), “A description of the actions which facility personnel must take to comply with this section and WAC 173-303-360;”	X <sup>2</sup> Section 1.3.4	X <sup>2</sup> Sections 7.1, 7.2 through 7.2.5, and 7.3 <sup>3</sup> Sections 4.0, 8.2, 8.3, 8.4, and 11.0	X <sup>2</sup> Sections J.3.1, J.3.2 through J.3.2.5, and J.3.3 <sup>3</sup> Sections J.3, J.3.4, J.3.5, J.3.6, and J.5
-350(3)(b), “A description of the actions which will be taken in the event that a dangerous waste shipment, which is damaged or otherwise presents a hazard to the public health and the environment, arrives at the facility, and is not acceptable to the owner or operator, but cannot be transported, pursuant to the requirements of WAC 173-303-370(6), <i>Manifest system</i> , reasons for not accepting dangerous waste shipments;”	X <sup>2</sup> Section 1.3.4	X <sup>2,4</sup> Section 7.2.5.1	X <sup>2,4</sup> Section J.3.2.5.1

**Table J-1 Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173-303-350(3)**

<b>Requirement</b>	<b>Permit Attachment 4, <i>Hanford Emergency Management Plan</i> (DOE/RL-94-02)</b>	<b><i>Building Emergency Plan</i><sup>1</sup> (HNF-39903)</b>	<b>IDF Addendum J.1, <i>Pre-Active Life Contingency Plan</i></b>
-350 (3)(c), “A description of the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services as required in WAC 173-303-340(4);”	X Sections 3.2.3, 3.3.1, 3.3.2, 3.4, 3.4.1.1, 3.4.1.2, 3.4.1.3, 3.7, and Table 3-1		
-350 (3)(d), “A current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator required under WAC 173-303-360(1). Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates. For new facilities only, this list may be provided to the department at the time of facility certification (as required by WAC 173-303-810(14)(a)(I)), rather than as part of the permit application;”		X <sup>5</sup> Sections 3.1 and 13.0	X <sup>5</sup> Sections J.2 and J.7
-350(3)(e), “A list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities;”		X Section 9.0	X Section J.4
-350(3)(f), “An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe the signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.”	X <sup>6</sup> Figure 7-3 and Table 5-1	X <sup>7</sup> Section 1.5	X <sup>7</sup> Section J.1



**Table J-1 Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173-303-350(3)**

Requirement	Permit Attachment 4, <i>Hanford Emergency Management Plan</i> (DOE/RL-94-02)	<i>Building Emergency Plan</i> <sup>1</sup> (HNF-39903)	IDF Addendum J.1, <i>Pre-Active Life Contingency Plan</i>
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An “X” indicates requirement applies.

<sup>1</sup>Portions of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) not enforceable through Appendix A of that document are not made enforceable by reference in the Building Emergency Plan.

<sup>2</sup>Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) contains descriptions of actions relating to the Hanford Site Emergency Preparedness System. No additional description of actions is required at the site level. If other credible scenarios exist or if emergency procedures at the unit are different, the description of actions contained in the Building Emergency Plan will be used during an event by a Building Emergency Director (BED).

<sup>3</sup>Sections 7.1, 7.2 through 7.2.5, and 7.3 of the Building Emergency Plan are those sections subject to the Class 2 “Changes in emergency procedures (i.e., spill or release response procedures,)” described in WAC 173-303-830, Appendix I Section B.6.a.

<sup>4</sup>This requirement only applies to Treatment, Storage, and Disposal (TSD) units that receive shipment of dangerous or mixed waste defined as off-site shipments in accordance with WAC 173-303.

<sup>5</sup>Emergency Coordinator names and home telephone numbers are maintained separate from any contingency plan document on file in accordance with Permit Condition II.A.4 and is updated, at a minimum, monthly.

<sup>6</sup>The Hanford Facility (Site-wide) signals are provided in this document. No unit/building signal information is required unless unique devices are used at the unit/building.

<sup>7</sup>An evacuation route for the TSD unit must be provided. Evacuation routes for occupied buildings surrounding the TSD unit are provided through information boards posted within buildings.

## **J.1 Building Evacuation Routing**

Figure J-1 provides identification of the primary and secondary staging areas and a general layout of the IDF. Alternate evacuation routes will be used on a case-by-case basis based on meteorological conditions at the time of the event.

## **J.2 Building Emergency Director/Building Warden**

Emergency response will be directed by the BED/Building Warden (BW) until the Incident Commander (IC) arrives. The Incident Command System (ICS) and staff with supporting on-call personnel fulfill the responsibilities of the Emergency Coordinator as discussed in WAC 173-303-360. During events, IDF personnel perform response duties under the direction of the BED/BW. The Incident Command Post (ICP) is managed by the senior Hanford Fire Department official, unless the event is determined to be primarily a security event, in which case the Hanford Fire Department and Hanford Patrol will operate under a unified command system with Hanford Patrol making all decisions pertaining to security. These individuals are designated as the IC, and as such, have the authority to request and obtain any resources necessary for protecting people and the environment.

The BED/BW becomes a member of the ICP and functions under the direction of the IC. In this role, the BED/BW continues to manage and direct IDF operations.

A listing of BED/BWs by title, work location, and work telephone number is contained in Section J.7.1 of this plan. The BED/BW is on the premises or is available through “on-call” list 24 hours a day. Names and home telephone numbers of the BED/BWs are available from the Patrol Operations Center (POC) in accordance with Permit Condition II.A.4.

### **J.3 Implementation of the Plan**

In accordance with WAC 173-303-360(2)(b), the BED/BW ensures that trained personnel identify the character, source, amount, and a real extent of the release, fire, or explosion to the extent possible. Identification of waste can be made by activities that can include, but are not limited to, visual inspection of dangerous waste, sampling activities in the field, reference to inventory records, or by consulting with facility personnel. Samples of materials involved in an emergency might be taken by qualified personnel and analyzed as appropriate. These activities must be performed with a sense of immediacy and shall include available information.

The BED/BW shall use the following guidelines to determine if an event has met the requirements of WAC 173-303-360(2)(d):

1. The event involved an unplanned spill, release, fire, or explosion,  
AND
- 2.a. The unplanned spill or release involved a dangerous waste, or the material involved became a dangerous waste as a result of the event (e.g., product that is not recoverable),  
OR
- 2.b. The unplanned fire or explosion occurred at the IDF or transportation activity subject to RCRA contingency planning requirements,  
AND
3. Time-urgent response from an emergency services organization was required to mitigate the event or a threat to human health or the environment exists.

As soon as possible, after stabilizing event conditions, the BED/BW shall determine, in consultation with the site contractor environmental single point-of-contact, if notification to the Washington State Department of Ecology (Ecology) is needed to meet WAC-173-303-360(2)(d) reporting requirements. If all of the conditions under 1, 2, and 3 are met, notifications are to be made to Ecology. Additional information is found in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 4.2.

If review of all available information does not yield a definitive assessment of the danger posed by the incident, a worst-case condition will be presumed and appropriate protective actions and notifications will be initiated. The BED/BW is responsible for initiating any protective actions based on their best judgment of the incident.

The BED/BW must assess each incident to determine the response necessary to protect the personnel, facility, and the environment. If assistance from Hanford Patrol, Hanford Fire Department, or ambulance units is required, the Hanford Emergency Response Number (911 from site office phones/373-0911 from cellular phones) must be used to contact the POC and request the desired assistance. To request other resources or assistance from outside the IDF, the POC business number is used (373-3800).

#### **J.3.1 Protective Actions Responses**

Protective action responses are discussed in the following sections. The steps identified in the following description of actions do not have to be performed in sequence because of the unanticipated sequence of incident events.

##### **J.3.1.1 Evacuation**

If an evacuation is ordered or the evacuation siren sounds in the area of the IDF, personnel will proceed to the staging area.

The BED/BW or staging area manager directs the evacuation; however, to ensure that evacuations can be conducted promptly and safely, all personnel must be familiar with the evacuation procedure.

Area evacuations are rapid or controlled and the differences between them are pointed out in the following steps. When possible, these steps must be performed concurrently.

Area Evacuation Procedure
Halt any operations or work and place equipment and structures in a safe condition. Use emergency shutdown procedures for rapid evacuation.
Use whatever means are available (portable radios, bullhorns, runners, etc.) to pass the evacuation information to personnel.
Evacuate personnel to the staging area; group personnel as follows: potentially contaminated protective clothing, keys immediately available for vehicles, and those needing rides. Assist personnel that are temporarily/permanently disabled.
Conduct personnel accountability. If unable to account for personal, report personnel accountability results to the Hanford Emergency Operations Center (Hanford-EOC).
Inform IC of any potentially affected personnel (i.e., injured, contaminated, exposed, etc.) once the IC arrives at the ICP.
Relay pertinent evacuation information (routes, destination etc.) to drivers.
Dispatch vehicles as soon as the vehicles are loaded.
Report status to the Hanford-EOC, request additional transportation if required, and report if any personnel remain who are performing late shutdown duties.

#### J.3.1.2 Take Cover

When the Take Cover Alarm is activated, personnel will take cover in the nearest suitable building or trailer.

A message followed by the Take Cover siren is transmitted over the area emergency sirens. The following actions must be taken or considered:

- Shut doors and windows and wait for further instructions.
- Secure ventilation system.
- Follow normal exit procedures from radiological areas.
- Lock up classified documents and prepare for a possible evacuation.
- Report your location to the Accountability Aid or the BED/BW.
- Accountability Aides will provide accountability status to the Staging Area Manager for IDF personnel during an event.
- Inform IC of any potentially affected personnel (i.e., injured, contaminated, exposed, etc.) once the IC arrives at the ICP.

#### J.3.2 Response to Facility Operations Emergencies

Depending on the severity of the event, the BED/BW reviews the Site-wide and IDF emergency response procedure(s) and, as required, categorizes and/or classifies the event. If necessary, the BED/BW initiates area protective actions and Hanford Site Emergency Response Organization activation. The steps identified in the following description of actions do not have to be performed in sequence because of the unanticipated sequence of incident events.

**J.3.2.1 Loss of Utilities**

The only loss of utilities is electrical. Loss of electricity does not constitute an emergency, but must be restored as soon as possible. Electricity supplies power to the sump pumps used to remove accumulated leachate from the primary and secondary liners. The loss of water, ventilation, steam, air, and vacuum are not applicable to the IDF.

**J.3.2.2 Major Process Disruption/Loss of Plant Control**

N/A

**J.3.2.3 Pressure Release**

N/A

**J.3.2.4 Fire and/or Explosion**

In the event of a fire, the discoverer activates a fire alarm (pull box); calls 911 from site office phones/373-0911 from cellular phones or verifies that the Hanford Emergency Response Number has been called.

- Unless otherwise instructed, personnel shall evacuate the area/building by the nearest safe exit and proceed to the designated staging area for accountability.
- On actuation of the fire alarm, ONLY if time permits, personnel should shut down equipment and secure waste. The alarm automatically signals the Hanford Fire Department.
- The BED/BW proceeds directly to the ICP, obtains all necessary information pertaining to the incident, and sends a representative to meet Hanford Fire Department.
- The BED/BW provides a formal turnover to the IC when the IC arrives at the ICP.
- The BED/BW informs the Hanford Site Emergency Response Organization as to the extent of the emergency (including estimates of dangerous waste and mixed waste quantities released to the environment).
- If operations are stopped in response to the fire, the BED/BW ensures that systems are monitored for leaks, pressure buildup, gas generation, and ruptures.
- Hanford Fire Department firefighters extinguish the fire as necessary.

**J.3.2.5 Hazardous Material, Dangerous and/or Mixed Waste Spill**

Spills can result from many sources including process leaks, container spills or leaks, damaged packages or shipments, or personnel error. Spills of mixed waste are complicated by the need to deal with the extra hazards posed by the presence of Atomic Energy Act materials.

- The discoverer notifies the BED/BW and initiates SWIMS response:
  - Stops work.
  - Warns others in the vicinity.
  - Isolates the area.
  - Minimizes the exposure to the hazards.
  - Requests the BED/BW Secure ventilation.
- The BED/BW determines if emergency conditions exist requiring response from the Hanford Fire Department based on classification of the spill and injured personnel, and evaluates need to perform additional protective actions.
- If the Hanford Fire Department resources are not needed, the spill is mitigated with resources identified in Section J.4.5 and proper notifications are made.

- If the Hanford Fire Department resources are needed, the BED/BW calls 911 from site office phones/373-0911 from cellular phones.
- The BED/BW sends a representative to meet the Hanford Fire Department.
- The BED/BW provides a formal turnover to the IC when the IC arrives at the ICP.
- The BED/BW informs the Hanford Site Emergency Response Organization as to the extent of the emergency (including estimates of dangerous waste and mixed waste quantities released to the environment).
- If operations are stopped in response to the spill, the BED/BW ensures that systems are monitored for leaks, pressure buildup, gas generation, and ruptures.
- Hanford Fire Department stabilizes the spill.

#### **J.3.2.6 Damaged or Unacceptable Shipments**

The IDF does not receive on-site transfers or off-site shipments of dangerous and/or mixed waste.

### **J.3.3 Prevention of Recurrence or Spread of Fires, Explosions, or Releases**

The BED/BW, as part of the ICP, takes the steps necessary to ensure that a secondary release, fire, or explosion does not occur. The BED/BW takes measures, where applicable, to stop processes and maintenance activities, collect and contain released waste, and remove or isolate containers. The BED/BW shall also monitor for leaks, pressure buildups, gas generation, or ruptures in valves, pipes or other equipment, whenever this is appropriate.

### **J.3.4 Termination of Event, Incident Recovery, Restart of Operations**

Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 9.0, describes actions for event termination, incident recovery, and restart of operations. The extent by which these actions are employed is based upon the incident classification of each event. In addition, Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), also contains actions for the management of incompatible waste that might apply.

#### **J.3.4.1 Termination of Event**

For events where the Hanford-EOC is activated, the DOE-Richland (DOE-RL) or DOE-Office of River Protection (DOE-ORP) Emergency Manager has the authority to declare event termination. This decision is based on input from the BED/BW, IC, and other emergency response organization members. For events where the Hanford-EOC is not activated, the ICS and staff will declare event termination.

#### **J.3.4.2 Incident Recovery and Restart of Operations**

A recovery plan is developed when necessary in accordance with Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 9.2. A recovery plan is needed following an event where further risk could be introduced to personnel, the IDF, or the environment through recovery action and/or to maximize the preservation of evidence.

If this plan was implemented according to Section J.3, Ecology is notified before operations can resume. Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 5.1, discusses different reports to outside agencies. This notification is in addition to those required reports and must include the following statements:

- There are no incompatibility issues with the waste and released materials from the incident.
- All the equipment has been cleaned, fit for its intended use, and placed back into service.

The notification required by WAC 173-303-360(2)(j) may be made via telephone conference. Additional information that Ecology requests regarding these restart conditions will be included in the required 15-day report identified in Section J.5.

For emergencies not involving activation of the Hanford-EOC, the BED/BW ensures that conditions are restored to normal before operations are resumed. If the Hanford Site Emergency Response Organization was activated and the emergency phase is complete, a special recovery organization could be appointed at the discretion of DOE-RL to restore conditions to normal. This process is detailed in DOE-RL and contractor emergency procedures. The makeup of this organization depends on the extent of the damage and the effects. The on-site recovery organization will be appointed by the appropriate contractor's management.

### **J.3.5 Incompatible Waste**

After an event, the BED/BW or the on-site recovery organization ensures that no waste that might be incompatible with the released material is treated, stored, and/or disposed of until cleanup is completed. Clean up actions are taken by IDF personnel or other assigned personnel. Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 9.2.3, describes actions to be taken.

Waste from cleanup activities is designated and managed as newly generated waste. A field check for compatibility is performed before storage, as necessary. Incompatible wastes are not placed in the same container. Containers of waste are placed in approved storage areas appropriate for their compatibility class.

If incompatibility of waste was a factor in the incident, the BED/BW or the on-site recovery organization ensures that the cause is corrected.

### **J.3.6 Post Emergency Equipment Maintenance and Decontamination**

All equipment used during an incident is decontaminated (if practicable) or disposed of as spill debris. Decontaminated equipment is checked for proper operation before storage for subsequent use. Consumables and disposed materials are restocked. Spent fire extinguishers are replaced.

The BED/BW ensures that all equipment is cleaned and fit for its intended use before operations are resumed. Depleted stocks of neutralizing and absorbing materials are replenished, and protective clothing is cleaned or disposed of and restocked, etc.

## **J.4 Emergency Equipment**

Emergency resources and equipment for the IDF are presented in this section.

### **J.4.1 Fixed Emergency Equipment**

**Fixed Emergency Equipment**

Type	Location	Capability
6-inch Fire Hydrants	IDF	Fire suppression

#### J.4.2 Portable Emergency Equipment

##### Portable Emergency Equipment

Type	Location	Capability
Fire extinguishers	In motorized equipment (e.g., trucks, etc.), nearby structures (e.g., change trailers, storage buildings, etc.).	Use on any Class A, B, or C fires. (Note: Some are only B and C.) Do NOT use on sodium.

#### J.4.3 Communications Equipment/Warning Systems

##### Communications Equipment

Type	Location	Capability
Cell phones	Portable	Communication

NOTE: Site-wide communications and warning systems are identified in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Table 5-1.

#### J.4.4 Personal Protective Equipment

##### Personal Protective Equipment

Type	Location	Capability
N/A		

#### J.4.5 Spill Control and Containment Supplies

##### Spill Kits and Spill Control Equipment

Type	Location	Capability
N/A		

#### J.4.6 Incident Command Post

The ICP for the IDF is MO-607. Emergency resource materials are stored at this location. The IC could activate the Hanford Fire Department Mobile Command Unit if necessary.

#### **J.4.7 Coordination Agreements**

DOE-RL has established a number of coordination agreements, or Memoranda of Understanding (MOU) with various agencies to ensure proper response resource availability for incidents involving the Hanford Site. A description of the agreements is contained in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 3.0, Table 3-1.

#### **J.5 Required Reports**

Post incident written reports are required for certain incidents on the Hanford Site. The reports are described in Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 5.1.

Facility management must note in the TSD unit operating record, the time, date, and details of any incident that requires implementation of the contingency plan (Section J.3). Within fifteen (15) days after the incident, a written report must be submitted to Ecology. The report must include the elements specified in WAC 173-303-360(2)(k).

#### **J.6 Plan Location and Amendments**

A copy of this plan is maintained at MO-607.

This plan is reviewed and immediately amended as necessary, in accordance with Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 14.3.1.1.

#### **J.7 Facility/Building Emergency Response Organization**

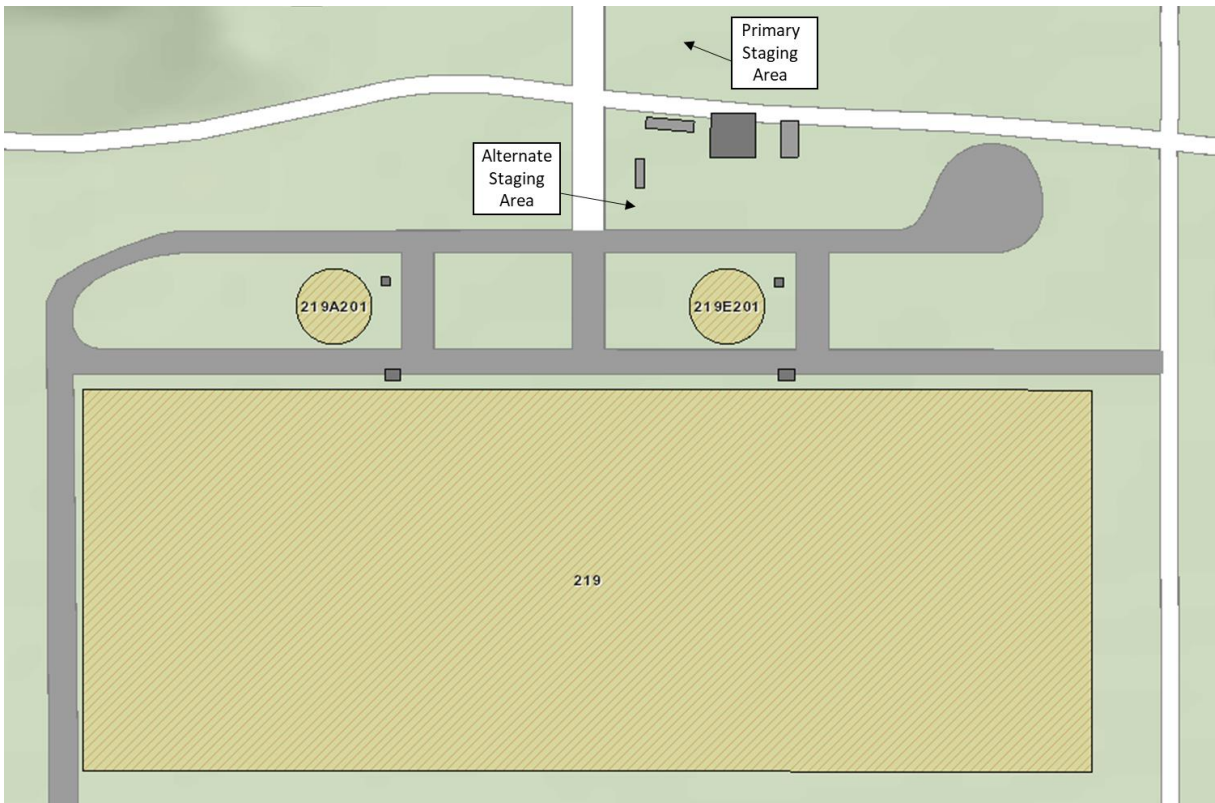
##### **J.7.1 Building Emergency Director/Building Warden**

<b>Building Emergency Director/Building Warden</b>	<b>Authority</b>	<b>Work Location</b>	<b>Work Phone</b>
IDF Field Work Supervisor	Primary	MO-607	280-0657
Environmental Restoration Disposal Facility (ERDF) Manager	1 <sup>st</sup> Alternate	MO-607	947-1651
ERDF Transportation Manager	2 <sup>nd</sup> Alternate	MO-607	430-6320
ERDF Disposal Manager	3 <sup>rd</sup> Alternate	Building 6250	308-2303

Names and home telephone numbers of the BED/BWs are available from the POC (373-3800) in accordance with Permit Condition II.A.4.



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**Figure J-1 Evacuation Routes**

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